

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HMC INCORPORATED and
KARA DIPIETRO,

Plaintiffs,

v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a PAR FUNDING and
FAST ADVANCE FUNDING, INC.,

Defendants.

Civil Action No. 19-cv-03285-JS

**DEFENDANTS COMPLETE BUSINESS SOLUTIONS GROUP, INC. AND FAST
ADVANCE FUNDING, INC.'S MOTION TO WITHDRAW
JONATHAN D. CHRISTMAN AS ATTORNEY**

Pursuant to Local Rule 5.1 and 7.1, Defendants Complete Business Solutions Group, Inc. d/b/a Par Funding ("CBSG") and Fast Advance Funding, Inc. ("FAF") (together, "Defendants"), by and through their attorneys, Fox Rothschild LLP ("Fox Rothschild"), hereby move this Honorable Court to grant withdrawal of Jonathan D. Christman ("Christman") as one of Defendants' attorneys in this matter. In support of this Motion, Defendants aver as follows:

1. Mr. Christman entered his appearance on behalf of Defendants on February 7, 2020. *See* ECF No. 29.
2. Mr. Christman will be leaving his employment as a partner with Fox Rothschild effective August 14, 2020.
3. As a result, Mr. Christman will no longer be involved in any of the proceedings or preparation in this lawsuit.

4. Fox Rothschild and lead counsel for Defendants, Brett Berman, who has also entered his appearance in this matter, continue to represent the Defendants in this matter.

WHEREFORE, Defendants request this Honorable Court grant the withdrawal of Jonathan D. Christman as an attorney of record for Defendants in this lawsuit.

Dated: August 12, 2020

Respectfully submitted:

FOX ROTHSCHILD LLP

By: /s/ Brett A. Berman

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*Attorneys for Defendants Complete Business
Solutions Group, Inc. d/b/a Par Funding
and Fast Advance Funding, Inc.*

CERTIFICATE OF SERVICE

I, Brett A. Berman, hereby certify that, on this date, I caused the foregoing document to be filed electronically with this Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document, upon the following:

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Attorneys for Plaintiffs HMC Incorporated and Kara DiPietro

By: /s/ Brett A. Berman
Brett A. Berman

Dated: August 12, 2020